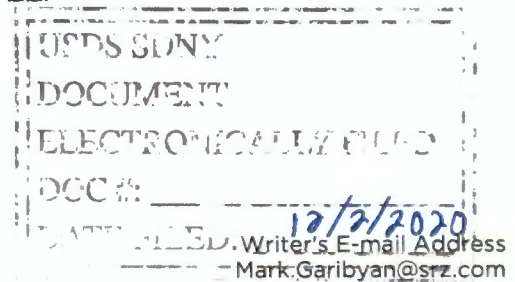


Schulte Roth & Zabel LLP

919 Third Avenue
New York, NY 10022
212.756.2000
212.593.5955 fax
www.srz.com




Writer's Direct Number
212.756.2093

December 2, 2020

BY ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

12/2/20 
John G. Koeltl, U.S.D.J.

Re: *Cerberus Business Finance, LLC, v. Matthew J. Martin, et al.*, 20-cv-01030
Stay of Deadlines

Dear Hon. Koeltl:

We write on behalf of Cerberus Business Finance, LLC, Plaintiff in the above-referenced matter.

As the Court is aware, Plaintiff and Defendants have signed a settlement letter of intent pursuant to which the parties have begun drafting a longer-form settlement agreement and several ancillary agreements to effectuate the parties' compromise.¹ The deadlines in this case were stayed until December 7, 2020 to allow the parties to finalize the settlement documents and for Defendant Matthew J. Martin (in his personal capacity) to dismiss his pending Chapter 11 bankruptcy case (a necessary condition to the settlement). The settlement documents and dismissal of the bankruptcy, once effective, will obviate this action.

Defendant Martin moved on November 18, 2020 to dismiss his bankruptcy case;² the deadline for interested parties to object to the dismissal is December 10, 2020. Additionally, Plaintiff and Defendants have exchanged drafts of the settlement documents and are working to finalize them.

Accordingly, after conferring with counsel for Defendants, we write to respectfully request Your Honor to extend the stay in this action for 45 days from December 7, 2020 to January 21, 2021. We believe that this approach will best preserve judicial resources as the bankruptcy is dismissed and the parties work towards completing the settlement documents.

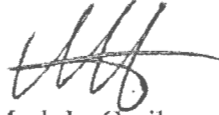
¹ Dkt. No. 21.

² *In re: Matt Jasper Martin*, 20-bk-40126 (Dkt. No. 67) (Bankr. N.D. Tex. Nov. 18, 2020).

December 2, 2020

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Garibyan', with a stylized flourish at the end.

Mark L. Garibyan

cc: Counsel of Record (By ECF and Email)